

IN THE UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division

UNITED STATES OF AMERICA

v.

DENNIS OWEN COLLINS,  
JEREMY LEROY HELLER,  
ZHIWEI CHEN,  
JOSHUA S. PHY,  
RYAN RUSSELL GUBELE,  
ROBERT AUDUBON WHITFIELD,  
ANTHONY TADROS,  
GEOFFREY KENNETH COMMANDER,  
PHILLIP GARRETT SIMPSON,  
AUSTEN L. STAMM,  
TIMOTHY ROBERT McCLAIN,  
WADE CARL WILLIAMS,  
THOMAS J. BELL,

Defendants.

Criminal No. 1:13-cr-383

The Hon. Liam O'Grady

**JOINT MOTION FOR ENTRY OF A STIPULATED PROTECTIVE ORDER**

The United States of America, by and through Dana J. Boente, Acting United States Attorney, and Jay V. Prabhu and Alexander T.H. Nguyen, Assistant United States Attorneys, and Richard D. Green, Trial Attorney of the Computer Crime and Intellectual Property Section of the Department of Justice, and the defendants, by their undersigned counsel, respectfully move this Honorable Court for entry of the attached stipulated Protective Order, pursuant to Federal Rule of Criminal Procedure 16(d)(1) and Federal Rule of Evidence 502(d). In support thereof, the parties state as follows:

1. During the course of the investigation, the United States has gathered or generated voluminous documents, including electronic records, which contain the confidential information and personal identifiers for victims, defendants, and non-parties in this case. These documents and electronic records include, but are not limited to, business records, investigative reports, log files, chat transcripts, victim correspondence, and other documents. The United States intends to produce these documents and electronic records, in accordance with the Federal Rules of Criminal Procedure, relevant case law, and this Court's Discovery Order.

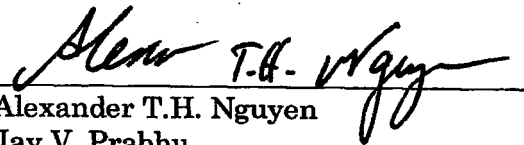
2. Accordingly, the proposed Protective Order regulates discovery in this case by restricting the use and dissemination of documents and electronic records obtained through discovery. In sum, the proposed Protective Order prohibits the dissemination of these documents and electronic records and the information contained therein to third parties, other than as necessary for the defendants' investigation of the allegations and the preparation of their defenses.

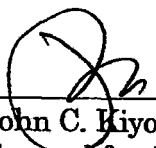
3. The defendants and their counsel have reviewed this Motion and the Protective Order, and have agreed to its terms.

WHEREFORE, the undersigned respectfully request that the Court enter the proposed Protective Order.

Respectfully submitted,

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Acting United States Attorney

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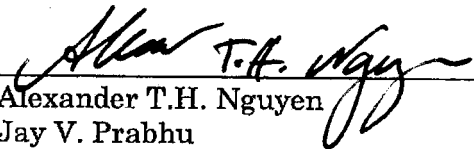
  
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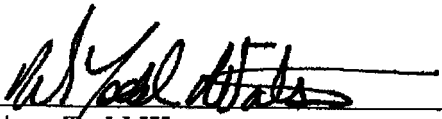
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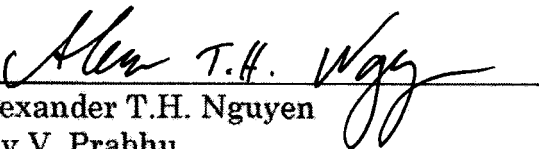
  
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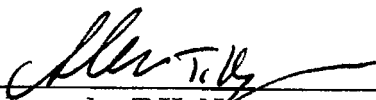
  
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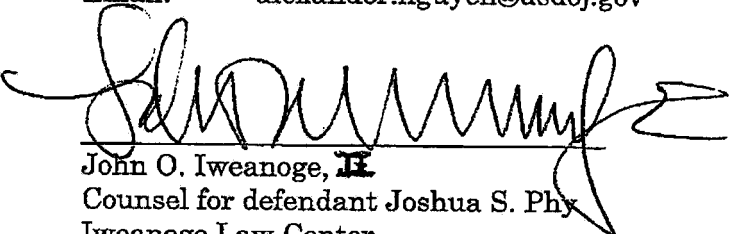
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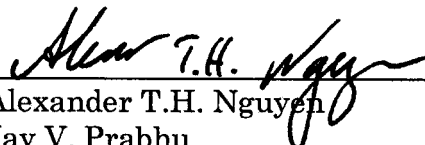
  
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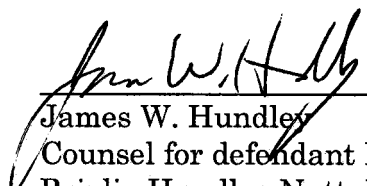
  
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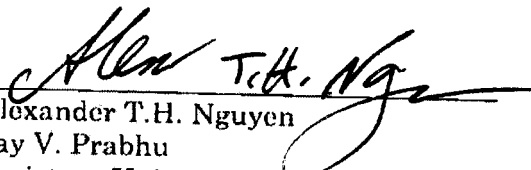
  
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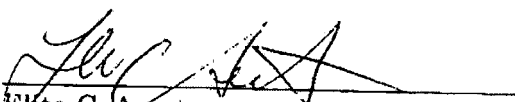
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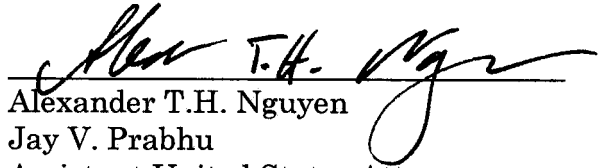
  
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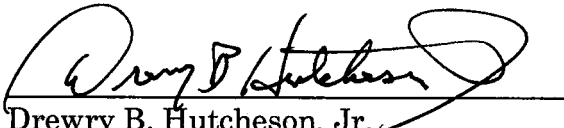
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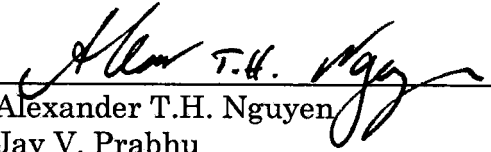
  
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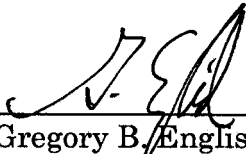
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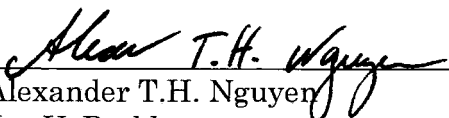
  
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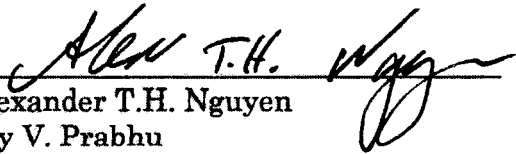
  
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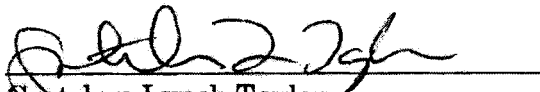
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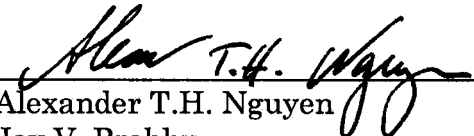
  
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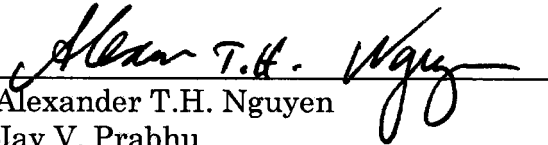
  
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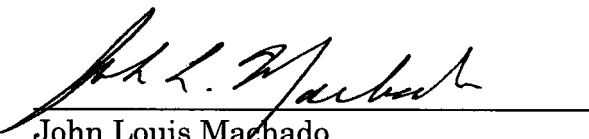
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**CERTIFICATE OF SERVICE**

I hereby certify that on October 21, 2013, I electronically filed the foregoing JOINT MOTION FOR ENTRY OF A STIPULATED PROTECTIVE ORDER with the Clerk of Court using the CM/ECF system, which will send a notification of that electronic filing (NEF) to the following:

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